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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**TWENTY FOURTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
SEPTEMBER 1, 2021 THROUGH AND INCLUDING SEPTEMBER 30, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	September 1, 2021 – September 30, 2021
Total Amount of Fees Incurred:	\$94,197.00
Total Fees Requested (80%):	\$75,357.60
Total Reimbursement of Expenses Incurred:	\$35.49
Total Reimbursement of Expenses Requested (100%):	\$35.49
Total compensation and Reimbursement Requested in this Statement:	\$75,393.09
This is Applicant's:	Twenty Fourth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twenty Fourth Monthly Fee Statement (the "Fee Statement") for the period of September 1, 2021 through and including September 30, 2021 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$94,197.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$75,357.60.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,169.83². The Blended hourly rate of all paraprofessionals is \$325.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$35.49 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$75,357.60, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

² The blended hourly billing rate of \$1,169.83 is derived by dividing the total fees for attorneys of \$93,937.00 by the total hours of 80.3.

³ The Blended hourly billing rate of \$325.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$260.00 by the total hours of .8.

connection with such services during the Statement Period (*i.e.*, \$94,197.00) and (ii) payment of \$35.49 for actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: November 12, 2021
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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Jennifer S. Feeney, Esq.
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New York, New York 10169
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*Co-Counsel to the Ad Hoc Committee of
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Litigation Claimants*

EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU04	Case Administration	8.5	\$9,274.00
PU06	Employment and Fee Applications	3.3	\$2,497.50
PU08	Litigation: Contest Matters, Adversary	5.5	\$5,932.50
PU09	Meetings and Communications w/ AHC	6.8	\$8,055.50
PU11	Plan & Disclosure Statement	57.0	\$68,437.50
	TOTALS:	81.1	\$94,197.00

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	43.7	\$61,180.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	36.6	\$32,757.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	.8	\$260.00
	TOTAL		81.1	\$94,197.00

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

November 9, 2021
BILL NO. 219989

For Services Rendered Through September 30, 2021:

Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/13/21 JSF	Telephone Call(s) Participate in Omnibus Court Hearing	5.00	4,475.00
09/13/21 MLC	Court Appearance - General Attended court hearing	3.30	4,620.00
09/29/21 JSF	Examine Documents Review of Summary of Proposed Sale of CellAct Assets	.20	179.00
TOTAL PHASE PU04		8.50	\$9,274.00

Phase: PU06	EMPLOYMENT & FEE APPLICATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/21 JSF	Examine Documents Review of June and July Monthly Fee Statements for Filing	.60	537.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/20/21 JSF	Prepare Legal Papers August Fee Statement	1.50	1,342.50
09/22/21 JKH	Prepare Papers Prepare August monthly statement	.60	195.00
09/23/21 JSF	Examine Documents Review of August Monthly Fee Statement	.40	358.00
09/23/21 JKH	Prepare Papers Prepare August monthly statement	.20	65.00
TOTAL PHASE PU06		3.30	\$2,497.50

Phase: PU08

LITIGATION: CONTESTED MATTERS, ADVERSARY

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/22/21 JSF	Examine Documents Review of Update re: Insurance Litigation and Discovery	.20	179.00
09/27/21 JSF	Telephone Call(s) Call with Co-Counsel re: Insurance Litigation and Discovery Requests	.80	716.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/27/21 JSF	Examine Documents Review of Documents re: Response to Discovery Request in Insurance Litigation	.80	716.00
09/27/21 MLC	Conference call(s) Conference call with Gilbert firm, Brown Rudnick and Kramer re discovery requests from insurance defendants	.80	1,120.00
09/27/21 MLC	Correspondence Correspondence with Gilbert firm re insurance defendants' request for documents discovery	.40	560.00
09/29/21 JSF	Telephone Call(s) Call with Co-Counsel re: Response to Insurance Discovery Request	.40	358.00
09/29/21 JSF	Examine Documents Review of Documents re Re: Insurance Discovery Request	1.30	1,163.50
09/29/21 MLC	Conference call(s) Conference call with Gilbert firm re insurance adversary discovery issues	.80	1,120.00
TOTAL PHASE PU08		5.50	\$5,932.50

Phase: PU09

MEETINGS & COMMUNICATIONS W/ AD HOC

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21 JSF	Telephone Call(s) Participate in Weekly AHC Call	.50	447.50
09/01/21 MLC	Conference call(s) Weekly meeting of AHC	.40	560.00
09/08/21 MLC	Conference call(s) Weekly meeting of AHC	1.00	1,400.00
09/14/21 JSF	Examine Documents Review of Updates to AHC	.30	268.50
09/15/21 MLC	Conference call(s) Conference call with AHC co-counsel and State subgroup	1.00	1,400.00
09/20/21 JSF	Examine Documents Review of Plan Updates to AHC	.70	626.50
09/21/21 JSF	Telephone Call(s) Call with Professionals and Subgroup of States' Representatives re: Appeal and Plan Issues	.40	358.00
09/23/21 JSF	Telephone Call(s) Attend Status Call with Professionals and State Representatives	.50	447.50
09/23/21 JSF	Examine Documents Review of Updates to AHC	.20	179.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/21 MLC	Conference call(s) Conference call with subgroup of AHC to review post-confirmation filings	1.00	1,400.00
09/28/21 JSF	Telephone Call(s) Participate in Update of Executive Committee of States' Representatives	.30	268.50
09/30/21 MLC	Conference call(s) Conference call update with certain state representatives and AHC counsel	.50	700.00
TOTAL PHASE PU09		6.80	\$8,055.50

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21 JSF	Telephone Call(s) Videoconference Participation in Confirmation Hearing Ruling	6.80	6,086.00
09/01/21 MLC	Court Appearance - General Attended court hearing for court ruling	8.00	11,200.00
09/01/21 MLC	Correspondence Correspondence with co-counsel to AHC and Debtor counsel re revisions to proposed confirmation order	.90	1,260.00

OTTERBOURG P.C.
230 PARK AVENUE
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21 MLC	Analysis of Memorandum Review of notices of appeal filed by Washington State and Washington DC	1.10	1,540.00
09/02/21 MLC	Analysis of Memorandum Follow up memo from KL summarizing ruling and next steps	.90	1,260.00
09/02/21 MLC	Analysis of Memorandum Review of 12th amended plan as revised (black-lined)	1.30	1,820.00
09/02/21 MLC	Analysis of Memorandum Review of draft application prepared by DPW for reimbursement of fees for Pillsbury, NERA, Brattle and Dr Hyde per agreement	1.30	1,820.00
09/02/21 MLC	Correspondence Correspondence with Andrew Troop re NOAT	.30	420.00
09/02/21 MLC	Analysis of Memorandum Review of suggested revisions by Troop to confirmation order draft	.60	840.00
09/03/21 MLC	Correspondence Correspondence with Troop and DPW re proposed revisions to draft confirmation order involving third party releases	.80	1,120.00
09/10/21 JSF	Examine Documents Review of Trust Documents	.40	358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/21 JSF	Examine Documents Review of Approved Plan	.80	716.00
09/14/21 JSF	Examine Documents Review of Plan and Waterfall of Payments to Creditors	1.30	1,163.50
09/14/21 MLC	Examine Documents Review of memo analyzing appeal issues	2.20	3,080.00
09/15/21 JSF	Telephone Call(s) Attend Working Group Call re: Post-Effective Date Matters	.90	805.50
09/15/21 JSF	Examine Documents Review of Workstreams Summary for Post-Effective Date Newco	.40	358.00
09/15/21 JSF	Examine Documents Review of Updted Distribution Waterfall	.50	447.50
09/15/21 JSF	Examine Documents Review of Appeals Issues and Next Steps	1.10	984.50
09/16/21 MLC	Analysis of Memorandum Review of appeals filed by DOJ and Maryland	3.10	4,340.00
09/17/21 JSF	Telephone Call(s) Call with States' Representatives and Professionals re: Status of Open Plan Items	.40	358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/21 JSF	Examine Documents Review and Analysis of Appeals Issues	1.80	1,611.00
09/20/21 JSF	Examine Documents Review and Attention to Appeals Papers Filed by States	2.30	2,058.50
09/21/21 JSF	Examine Documents Review of Appellants' in Motions for Stay and Legal Arguments	1.20	1,074.00
09/21/21 MLC	Analysis of Memorandum Review of KL memo concerning outline of appellate papers filed	1.80	2,520.00
09/23/21 JSF	Examine Documents Review of Modified Bench Ruling Confirming Plan	1.30	1,163.50
09/23/21 JSF	Examine Documents Review of UST Motion for Stay Pending Appeal	.90	805.50
09/23/21 MLC	Analysis of Memorandum Review of proposed changes to John Guard affidavit	.80	1,120.00
09/23/21 MLC	Examine Documents Review of summary of post-confirmation filings by objecting parties	.90	1,260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/21 MLC	Analysis of Memorandum Review of "bridge" stay papers filed by UST	1.30	1,820.00
09/24/21 JSF	Examine Documents Review of Appellate Papers re: Plan Confirmation	1.20	1,074.00
09/24/21 MLC	Analysis of Memorandum Review of appellate papers filed by DOJ seeking stay	3.70	5,180.00
09/28/21 MLC	Analysis of Memorandum Review of memorandum concerning direct appeals to Second Circuit	2.40	3,360.00
09/28/21 MLC	Examine Documents Review of memorandum outlining issues on appeal	3.10	4,340.00
09/30/21 JSF	Examine Documents Review of Updates re: Post-Confirmation Matters, Appeals and Stay Motions	1.20	1,074.00
TOTAL PHASE PU11		57.00	\$68,437.50
		TOTAL FOR SERVICES	\$94,197.00

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Air Freight	\$35.49
TOTAL:	\$35.49

EXHIBIT E

Expense Detail

OTTERBOURG P.C.
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NEW YORK, NY 10169-0075

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DISBURSEMENTS FOR YOUR ACCOUNT

Air Freight	35.49
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TOTAL DISBURSEMENTS	<hr/> 35.49
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